

E-Filed: October 8, 2013

1 Lawrence A. Organ, State Bar No. 175503
2 Barbara E. Figari, State Bar No. 251942
3 Robert J.A. Fordiani, State Bar No. 256041
EQUALITY LAWYERS, LLP
3 9100 Wilshire Boulevard, Suite 333E
4 Beverly Hills, CA 90210
(310) 910-9442
(310) 910-9446 FAX
5

6 Attorneys for Plaintiff
7
8 ROSARIO ALONSO

9 Rex Darrell Berry
10 BERRY & BLOCK, LLP
11 2150 River Plaza Drive, Suite 415
12 Sacramento, CA 95833
(916) 564-2000
(916) 564-2024 FAX

13 Attorneys for Defendant
14 WALGREEN CO.

15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROSARIO ALONSO, an individual,) Case No. 5:12-CV-06269-HRL

Plaintiff,)
v.)
WALGREEN CO., and DOES 1 – 50,)
inclusive,)
Defendants.)

STIPULATION CONTINUING EXPERT
DESIGNATION DATE; ~~PROPOSED~~
ORDER

Plaintiff Rosario Alonzo (“Plaintiff”) and Defendants Walgreen Co. (“Defendant”), through their respective counsel of record, stipulate and agree as follows:

The parties have engaged in significant written and deposition discovery. However, in light of availability and location, the parties have agreed on deposition dates for indispensable witnesses to occur after the discovery cut-off date. The indispensable witnesses to be deposed

1 are Walgreen's person most knowledgeable and human resource person, which are currently set
2 to take place in Chicago, Illinois on September 25, 2013 and September 26, 2013, respectively.

3 WHEREAS the testimony sought at deposition of Walgreen's person most
4 knowledgeable and human resource person is important for the purpose of any retained expert's
5 opinion as to the facts and circumstances involved in this matter, and is therefore significant for
6 any expert's reports or findings that may either be relied upon by the parties or assist the finder
7 of fact.

8 WHEREAS, the original date for designation of expert witnesses with reports was
9 August 6, 2013.

10 WHEREAS, the parties jointly stipulated on June 4, 2013 to extend the discovery-cut-off
11 date and designation of experts with reports from August 6, 2013 to September 23, 2013;
12 rebuttal experts with reports deadline extended from September 3, 2013 to October 21, 2013;
13 expert discovery cut-off date extended from September 17, 2013 to November 4, 2013; Last Day
14 for Hearings on Dispositive Motions extended from November 12, 2013 at 10:00 a.m. to
15 December 31, 2013 at 10:00 a.m.; and Final Pretrial Conference extended from December 10,
16 2013 at 1:30 p.m. to February 11, 2014.

17 WHEREAS, the signed joint stipulation was entered by the Court on June 5, 2013.

18 WHEREAS, per the Court's Local Rules, counsel for the parties have met and conferred
19 on scheduling dates and location of remaining depositions and extending the date for each side
to designate experts with reports.

20 WHEREAS, the parties jointly agreed to extend the date for designation of expert
21 witnesses with reports to October 4, 2013;

22 NOW THEREFORE, The undersigned parties submit this stipulated request and
23 respectfully request that the Court issue an Order as follows:

24 In order to accommodate the parties in completing the deposition discovery of
25 indispensable witnesses, and providing such information for possible expert witnesses and their
26 preparation of reports, the parties respectfully request an extension of the deadline to designate
27 experts with reports, and the Court include in its Order the following:

28 The designation of experts with reports will be extended from September 23, 2013 to

1 October 4, 2013 ~~or any such later dates as the Court see fit;~~

2 The designation of rebuttal experts with reports deadline will be extended from October
3 21, 2013 to November 4, 2013, ~~or any such later dates.~~

4 The expert discovery cut-off date will be extended from November 4, 2013 to November
5 22, 2013, ~~or any such later dates.~~

6 IT IS SO STIPULATED:

7 Date: September 25, 2013

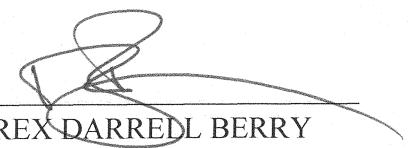
8 EQUALITY LAWYERS

9
10 /s/ Robert J.A. Fordiani
11 LARRY ORGAN
12 BARBARA FIGARI
13 ROBERT FORDIANI
14

15 Attorney for Plaintiff

16 Date: September 25, 2013

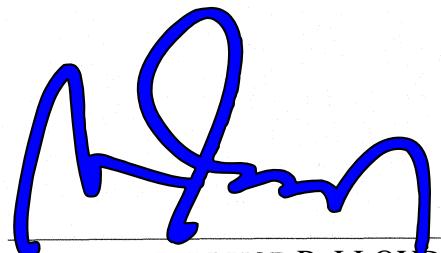
17 BERRY & BLOCK, LLP

18 
19 REX D. BERRY

20 Attorney for Defendant

21 IT IS SO ORDERED

22 Date: October 8, 2013

23 
24 HOWARD ~~L.~~ LLOYD R. LLOYD
25 UNITED STATES MAGISTRATE
26 JUDGE